

File No. 1694-5

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN THE MATTER OF:

Ronnie A. Green,
Sharon I. Green,

Debtor.

Chapter 13

Case No. 08 B 25983

Honorable Judge Schmetterer

**RESPONSE TO NOTICE OF CURE OF ALL PRE-PETITION
MORTGAGE OBLIGATION**

Now comes, Litton Loan Servicing, LLC and states as follows:

1. That on July 8, 2009, Chapter 13 Trustee Tom Vaughn filed a Notice of Payment of Final Mortgage Cure Amount. The Notice indicated that if the creditor is not post petition current, it must file a response within sixty days of said Notice.

2. The Debtor is not current on its post-petition mortgage payments regarding the real estate located at: 16850 Merrill, South Holland, Illinois 60473.

3. That since there is a post petition default the mortgage should not be considered fully reinstated.

4. The loan is post petition due for October 1, 2008. The following is due and owing:

- i. November 1, 2008 to July 1, 2009 at \$397.56 for a total of \$3,578.04;
- ii. \$139.16 in late charges;
- iii. \$100.00 in appraisals;
- iv. \$550.00 in post-petition bankruptcy fees;

Please note that the costs set forth in (iv) have not yet been proved up. That the total post petition default totals \$4,367.20. That based upon Debtor's default, the mortgagee is not required to treat the mortgage reinstated and fully current.

Respectfully submitted,

/s/ Mitchell A. Lieberman
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